

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

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**VIKRAM P. GROVER d/b/a
“IX ADVISORS” a/k/a “IXA,”**

Plaintiff,

v.

**NET SAVINGS LINK, INC., a
Colorado corporation and formerly
organized as a Nevada corporation,
WILTON GROUP, LIMITED, as
registered in the Isle of Man, U.K.,
WILTON UK (GROUP), LIMITED, as
registered in England and Wales, U.K.,
CHINA FOOD AND BEVERAGE CO.,
a Colorado corporation, and
JAMES A. TILTON,**

Defendants.

**Civil Action No. 1:21-cv-05054
Honorable Mary M. Rowland**

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**AFFIDAVIT OF PHILIP M. GIORDANO, ESQ. OF COMPLIANCE
WITH THIS HONORABLE COURT’S ORDERS OF JANUARY 19, 2022
AS TO SERVICE AND NOTICE TO DEFENDANTS OF COURT ORDERS
GRANTING RULE 55(a) ENTRIES OF DEFAULT AGAINST EACH DEFENDANT**

I, Philip M. Giordano, Esq., being duly sworn, depose and state as follows:

1) I am an attorney, admitted and in good standing, *inter alia*, to the bars of the Commonwealth of Massachusetts and the State of New York, and, *inter alia*, the United States Supreme Court, the U.S. Court of Appeals for the First Circuit and the U.S. District Court for the District of Massachusetts. Together with Jeffrey R. Tone, Esq. of Katten & Temple, LLP, my Firm and I are counsel to the Plaintiff, Vikram P. Grover (hereinafter “Mr. Grover”), in the instant case. I make this Affidavit based upon my knowledge and understanding, including information

provided to me by the staff at my Firm, and from the website of Federal Express. I further make this Affidavit in compliance with this Honorable Court's Order of January 19, 2022 as to service and notice to the Defendants of this Court's Orders granting Rule 55(a) Entries of Default against each Defendant, as requested by the Plaintiff.

2) On various dates in December 2021, the Plaintiff filed certain Requests Pursuant to Rule 55(a) for Entry of Default as to each Defendant with this Court, as the various deadlines had expired for each such Defendant's time to file responsive papers to the Complaint in this action.

3) On January 19, 2022, this Honorable Court held a telephonic status conference, as attended by me and Mr. Tone, on behalf of the Plaintiff. No attorney identified his or her appearance for a Defendant at the January 19th telephonic status conference with this Court.

4) Thereafter, on January 19, 2022, this Honorable Court entered certain "Minute entries," which requiring the Plaintiff, by and through counsel, to serve copies of the respective ECF Notices and Orders upon each Defendant, as to this Court's granting the Rule 55(a) Requests for Entry of Default with respect to such Defendant. (ECF Nos. 25 – 30).

5) As a result thereof, on or about January 24, 2022, I caused my paralegal, Ashley MacDonald, to serve a copy of the respective January 19th ECF Notice and Order, by first class mail, postage prepaid, upon the Defendant, Net Savings Link, Inc. Ms. MacDonald informs me that she personally placed such ECF Notice and Order in the mailbox, as maintained by the U.S. Postal Service, and that, as of the date hereof, this Firm has not received any notification or returned mail as to the same by the U.S. Postal Service.

6) Also on or about January 24, 2022, I caused my paralegal, Ashley MacDonald, to serve a copy of the respective January 19th ECF Notice and Order, by first class mail, postage prepaid, upon the Defendant, China Food and Beverage Co. Ms. MacDonald informs me that she

personally placed such ECF Notice and Order in the mailbox, as maintained by the U.S. Postal Service, and that, as of the date hereof, this Firm has not received any notification or returned mail as to the same by the U.S. Postal Service.

7) Also on or about January 24, 2022, I caused my paralegal, Ashley MacDonald, to serve a copy of the respective January 19th ECF Notice and Order, by first class mail, postage prepaid, upon the Defendant, James A. Tilton. Ms. MacDonald informs me that she personally placed such ECF Notice and Order in the mailbox, as maintained by the U.S. Postal Service, and that, as of the date hereof, this Firm has not received any notification or returned mail as to the same by the U.S. Postal Service.

8) Also on or about January 24, 2022, I caused my paralegal, Ashley MacDonald, to serve a copy of the respective January 19th ECF Notice and Order, by Federal Express, overnight delivery prepaid, upon the Defendant, Wilton UK (Group), Limited, in London, United Kingdom. Ms. MacDonald informs me that she personally delivered such ECF Notice and Order to a Federal Express branch, as maintained by FedEx, and that, as of the date hereof, this Firm has not received any notification or returned FedEx package from Federal Express.

9) According to the FedEx website, such ECF Notice and Order was delivered to the Defendant, Wilton UK (Group), Limited, by Federal Express, and that such package was delivered on January 26, 2022 at 11:22 a.m. (Local U.K. Time), and was signed for by “S. Tanya CVD.”

10) A true copy of FedEx Receipt No. 775836525203, reflecting the January 26, 2022 delivery to the Defendant, Wilton UK (Group), Limited, is attached, restated, and incorporated by reference herein as **Exhibit A**.

11) Also on or about January 24, 2022, I caused my paralegal, Ashley MacDonald, to serve a copy of the respective January 19th ECF Notice and Order, by Federal Express, overnight

delivery prepaid, upon the Defendant, Wilton Group, Limited, in the Isle of Man, United Kingdom. Ms. MacDonald informs me that she personally delivered such ECF Notice and Order to a Federal Express branch, as maintained by FedEx and that, as of the date hereof, this Firm has not received any notification or returned FedEx package from Federal Express.

12) According to the FedEx website, such ECF Notice and Order was delivered to the Defendant, Wilton Group, Limited, by Federal Express, and that such package was delivered on January 28, 2022 at 11:15 a.m. (Local U.K. Time), and was signed for by “Lindsey.”

13) A true copy of FedEx Receipt No. 775836763714, reflecting the January 28, 2022 delivery to the Defendant, Wilton Group, Limited, is attached, restated, and incorporated by reference herein as **Exhibit B**.

Signed under the pains and penalties of perjury, this 28th day of January, 2022.

Dated: January 28, 2022

/s/ Philip M. Giordano
Philip M. Giordano

CERTIFICATE OF SERVICE

I, Philip M. Giordano, do hereby certify that on this 28th day of January, 2022, I caused to be served a true and correct copy of the Affidavit of Philip M. Giordano, Esq., in Compliance with this Honorable Court's Orders of January 19, 2022 as to Service and Notice to Defendants of Orders Granting Rule 55(a) Entries of Default against Each Defendant, together with **Exhibits**, as filed by and through the District Court's electronic filing/ECF system and that such true copy is available for downloading and viewing by all parties or counsel of record

Dated: January 28, 2022

/s/ Philip M. Giordano
Philip M. Giordano